



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

August 1, 1989

Mr. John G. Whitehead
Plant Manager
UTC Pratt & Whitney Aircraft
400 Main Street
East Hartford, Connecticut 06108

RCRA RECORDS CENTER
FACILITY Pratt & Whitney - Main St
I.D. NO. CTD 990672081
FILE LOC. R-1B
OTHER RDMS #2898

RE: Comments on July 7, 1989 closure plan for the Burn Zol
hazardous waste incinerator located at Main Street,
East Hartford, facility.
EPA I.D. No. CTD 990672081

Dear Mr. Whitehead:

The Environmental Protection Agency (EPA) and the Connecticut Department of Environmental Protection (DEP) have completed a review of the revised incinerator closure plan dated July 7, 1989. The following information is necessary in order to make the closure plan complete. Please provide a complete response to these comments as an addendum to the revised closure plan within fourteen (14) days of the receipt of this letter.

Comments:

1. The Appendix VIII parameter list must be complete. Please provide a justification as to the absence of all Appendix VIII constituents not in the proposed analytical parameter list.
2. Provide a quantitative criteria for the determination that the non-porous surfaces cleaned by hydro-blasting are properly decontaminated and present no threat to human health or the environment.
3. Revise the submitted closure plan to show that a chisel will be used to take concrete chip samples.
4. Page 2 Section 3.0, 3rd paragraph, 4th sentence.

It appears that the word "equipment" needs to be added after "air pollution control" to make it a complete sentence.

5. Page 2 Section 3.0, 6th paragraph, 3rd sentence.

A clarification is needed for what is meant by "3 inches of forced air cooling." Is there piping or space between the 2 shells of the incinerator?

6. Page 7 & 9 Section 7.0 Subparagraph 1+6

AUG - 4 1989

1. A discussion as to where and how the disposal of the rinsates from the decontamination process(es) will be handled should be included.
 2. Will all of the rinsates from the decontamination processes go to the CWTP for disposal?
 3. Will the discharge of the rinsates to CWTP be permitted under the CWTP's NPDES permit?
7. Page 9, Section 9.0 Subparagraph 7

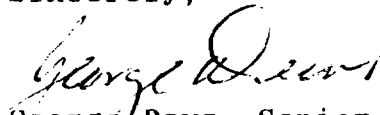
Does a secure landfill disposal facility mean a RCRA permitted facility?

8. Appendix A 1 page 2, Section D

For "on-site control" - the Section indicates that the "safe perimeter has been established at the incineration building entrance". This appears to be inaccurate because the incinerator, the waste heat boiler and some of the ducting are currently located outside the building. This inconsistency should be rectified in the revised closure plan.

If there are any questions, please contact George Dews, or Stephen Yee.

Sincerely,



George Dews, Senior Sanitary Engineer
CT Department of Environmental Protection
Hazardous Waste Management Section
(203) 566-2264



Stephen Yee, Environmental Engineer
CT Compliance Enforcement Section
(617) 573-9644

ROUTING AND TRANSMITTAL SLIP

Date

7/28/89

TO: (Name, office symbol, room number, building, Agency/Post)

Initials

Date

1. George Dewes

2. CT DEP

3. HW Section

4.

5.

Action	File	Note and Return
Approval	For Clearance	Per Conversation
As Requested	For Correction	Prepare Reply
Circulate	For Your Information	See Me
Comment	Investigate	Signature
Coordination	Justify	

REMARKS

Attached is the letter for Pratt & Whitney's
Closure Plan for your signature.
Also please date the letter and
send me a copy (over) →
Stephen
mailed to company + you
8/1/89

E. Leavor

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)

Room No. Bldg.

Stephen Yee

Phone No.

617-573 9644

5041-102

* U.S. GPO: 1985 O-451-247/20041

OPTIONAL FORM 41 (Rev. 7-78)

Prescribed by GSA
FPMR (41 CFR) 101-11.206

Stephen:

Please forward dist 23 John

public notice to George

for me at Shanahan

George

productivity of
exchange with
low risk at
Shanahan and
John

THE OFFICE OF THE
ATTORNEY GENERAL
STATE OF NEW YORK
ALBANY

By George
Attorney

28/85/5
ALBANY